

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
Western Division
Civil Case No. 5:19-cv-249-Fl**

MATTHEW BRADLEY,

Plaintiff

v.

ANALYTICAL GRAMMAR, INC.

Defendant

**PLAINTIFF'S CONSENTED
MOTION FOR EXTENSION OF TIME
FOR DESIGNATION OF COUNSEL**

Plaintiff Matthew Bradley respectfully moves the Court for an additional **thirty (30) days**, through and including **May 28, 2021**, within which to designate successor counsel to replace Mr. Richard Liebowitz, who was disqualified from representing Plaintiff by Order of this Court [Docket #68], or to file a notice of self-representation. In support of this motion, Plaintiff shows the Court:

1. On March 19, 2021, this Court ordered that Plaintiff's principal counsel was disqualified from representing him. The Court directed that the Clerk notify Plaintiff to either cause notice of appearance to be filed by new counsel on his behalf, or to file a notice of self-representation as required in accordance with Local Civil Rule 5.2(b), within 40 days of the date of the Order. That 40 days has not yet expired, but will expire on April 28, 2021.
2. On March 22, 2021, undersigned counsel obtained from Mr. Liebowitz, and provided to the Court, Plaintiff's address for purposes of the Clerk's notification. Thereafter, the Clerk transmitted to Plaintiff and Plaintiff received a copy of the Court's order.
3. After contacting the undersigned, Plaintiff (a California resident) reached out to the firm of Olive & Olive, P.A., in Durham, North Carolina, and Ms. Susan Freya Olive, who is a member of the Bar of this Court, agreed to review his case and to consider representing him. Ms. Olive has confirmed to the undersigned that she has been familiarizing herself with the case, has spoken with opposing counsel, and has reviewed those documents that have thus far been made available to her by former and local counsel. Ms. Olive reports that Liebowitz Law Firm agreed to provide

Plaintiff's file and has provided documents on two separate occasions to date, including most recently on April 26, but that she believes there are additional documents still missing from that file. By way of example, she reports that there is not a complete copy of the pleadings in the materials provided to her thus far, that many emails referencing attached documents have not included those attachments, and that there does not appear to be any significant legal research or analysis in the files provided to date.

4. Before agreeing to enter the case, Ms. Olive needs additional time to obtain and review the complete file, to confer with opposing counsel, and to make appropriate recommendations to Plaintiff. Plaintiff himself needs that information, as well, before proceeding. Ms. Olive anticipates that a thirty-day extension of time should be sufficient for this purpose.
5. Defendant, through counsel, has been consulted by Ms. Olive and has expressly agreed in writing to the requested extension of time.

WHEREFORE, Plaintiff respectfully moves the Court for a 30-day extension of the deadline for his compliance with the Court's order, Docket #68, through and including May 28, 2021.

This 28th day of April, 2021.

PLAINTIFF, through Local Counsel:

ALLAN LAW FIRM, PLLC

By: s/Albert P. Allan

Albert P. Allan

435 East Morehead Street

Charlotte, NC 28202

704-371-5605

alallan@allaniplitigation.com

L.R. 83.1 Counsel

CERTIFICATE OF SERVICE

Undersigned local counsel for Plaintiffs certifies that the foregoing document was served this date on Defendant by electronically filing the same with the Clerk of Court using the CM/ECF System, which will send notification via electronic means to counsel for Defendant, on this 28th day of April, 2021.

s/Albert P. Allan

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